

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KAMILAH BROCK,

Plaintiff,

**NOTICE OF MOTION**

- against -

15 Civ. 1832 (VSB)

THE CITY OF NEW YORK, NEW YORK CITY  
HEALTH AND HOSPITALS CORPORATION,  
HARLEM HOSPITAL, DR. ELISABETH  
LESCOUFLAIR, Individually and in her official capacity,  
DR. ZANA DOBROSHI, Individually and in her official  
capacity, DR. ALAN DUDLEY LABOR, Individually and  
in his official capacity, DR. HERMAN ANDERSON,  
Individually and in his official capacity, and POLICE  
OFFICER SALVADOR DIAZ, Shield No. 21953,  
Individually and in his official capacity,,

Defendants.

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**PLEASE TAKE NOTICE** that upon the Declaration of Joshua J. Lax, dated January 12, 2017, and the exhibits annexed thereto, Defendants' Statement of Undisputed Facts pursuant to Local Civil Rule 56.1 dated January 12, 2017, and the accompanying memorandum of law, dated January 12, 2017, and all pleadings and proceedings previously had herein, defendants City of New York New York City Health and Hospitals Corporation, Harlem Hospital, Elisabeth Lescouflair, Zana Dobroshi, Alan Dudley Labor and Salvador Diaz, will move this Court before the Honorable Vernon S. Broderick, United States District Judge, at the United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York, at a date and time to be determined by the Court, for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems just, proper and equitable; and

**PLEASE FURTHER TAKE NOTICE** that pursuant to the Court's January 4, 2017 order, opposition papers, if any, should be filed and served on the undersigned on or before February 23, 2017; and

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's January 4, 2017 order, reply papers, if any, should be filed and served on or before March 9, 2017.

Dated: New York, New York  
January 12, 2017

ZACHARY W. CARTER  
Corporation Counsel of the  
City of New York  
*Attorney for Defendants*  
100 Church Street  
New York, New York 10007  
(212) 356-3538

By: /s/  
Joshua J. Lax  
Senior Counsel  
Special Federal Litigation Division

TO: BY ECF  
Jessica Massimi, Esq.  
Law Offices of Michael S. Lamonsoff, PLLC  
32 Old Slip, 8th Floor  
New York, New York 10005